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Attorneys for Defendant
CLUB CHAMPION LLC, a Delaware limited liability company

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

GABRIEL RAMIREZ, an individual

Plaintiff,

vs.

CLUB CHAMPION LLC, a Delaware limited
liability company, and DOES 1-10

Defendants.

Case No. 3:23-cv-00416-TLT

**STIPULATION OF DISMISSAL WITH
PREJUDICE; ~~PROPOSED~~ ORDER**

Hon. Trina L. Thompson

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure Section
3 41(a)(1)(ii), Plaintiff Gabriel Ramirez (“Plaintiff”) and Defendant Club Champion LLC
4 (“Defendant”) hereby stipulate as follows:

5 1. On January 27, 2023, Plaintiff filed the above-captioned lawsuit (this “Action”) in the
6 United States District Court, Northern District of California.

7 2. On March 30, 2023, Defendant filed an answer to the Complaint.

8 3. Plaintiff and Defendant have reached a settlement of all claims and have entered into
9 a settlement agreement regarding those claims.

10 4. Based on the foregoing facts, Plaintiff and Defendant jointly stipulate and request as
11 follows:

12 a. This Court should dismiss the Action in its entirety against Defendant with
13 prejudice.

14 b. All upcoming hearings and deadlines should be vacated and the Action should be
15 terminated.

16 DATED: December 12, 2023

17 Respectfully submitted,

18 THE LITIGATION LAW GROUP

19 By: Linda Keny
20 Lawrence P. Ramirez
21 Linda Keny
22 Ryan Newman
Attorneys for Plaintiff
GABRIEL RAMIREZ

23 DATED: December 12, 2023

24 Respectfully submitted,

25 SEYFARTH SHAW LLP

26 By: Pamela Vartabedian
27 Sean Piers
28 Attorneys for Defendant
CLUB CHAMPION LLC

~~PROPOSED~~ ORDER

Having read the Joint Stipulation for Dismissal with Prejudice, IT IS HEREBY ORDERED
THAT:

1. The stipulation is approved;
2. The entire action, including all claims stated therein against all parties, is hereby
dismissed with prejudice; and
3. Each party to bear his/its own attorneys' fees and costs.

DATED: December 13, 2023


Hon. Trina L. Thompson